

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SUN, YUCHEN JUSTIN,

Plaintiff and Counterclaim-Defendant,

-against-

DAVID GEFFEN and ITHAKA TRUST

Defendants and Counterclaim-Plaintiffs,

-and-

LE NEZ,
a sculpture,

Defendant-in-rem.

Case No. 1:25-cv-00995

**[PROPOSED] ORDER GRANTING UNOPPOSED MOTION FOR ISSUANCE OF
HAGUE CONVENTION REQUEST FOR INTERNATIONAL JUDICIAL ASSISTANCE
TO OBTAIN EVIDENCE IN THE REPUBLIC OF SINGAPORE**

The Court, having reviewed Defendants and Counterclaim-Plaintiffs David Geffen and Ithaka Trust's Unopposed Motion for Issuance of a Hague Convention Request for International Judicial Assistance to Take Testimony Overseas and the accompanying papers, HEREBY ORDERS THAT:

1. The Motion is GRANTED.
2. The Request for Judicial Assistance Pursuant to the Hague Convention of 18 March 1970 on the Taking of Evidence Abroad in Civil or Commercial Matters attached as Exhibit A to the Declaration of Tibor L. Nagy, Jr., is hereby issued as the Court's "Letter of Request" and is fully incorporated herein.

3. The signed Order and the Letter of Request will be given to Nagy Wolfe Appleton LLP, which will cause both documents to be filed with the appropriate judicial authority in Singapore.

4. The Stipulation and Order of Confidentiality (ECF No. 31) in this action shall apply to any documents produced by Helu-Trans (S) Private Limited or Helu-Trans Asiapacific (S) Pte. Ltd. (collectively, “Helu-Trans”) and the testimony of their directors and/or officers, including any transcript or video.

5. Neither this Order, nor the terms of the Letter of Request (which are incorporated into this Order) shall be construed or operate as a waiver of any argument, position, objection, allegation, or claim or defense of any party in the above-captioned action, or of the attorney-client privilege, the work-product doctrine, or any other privileges, rights, protections, or prohibitions that may apply to that evidence under the laws of the Republic of Singapore, the United States of America, or the State of New York.

IT IS SO ORDERED.

DATED: _____

THE HONORABLE ANALISA TORRES
UNITED STATES DISTRICT JUDGE